

**Performance Work Statement  
CORRECTIVE ACTION SUPPORT  
Solutia, Sauget, IL  
BASF Cleveland, Cleveland, OH  
5 Additional Facilities**

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CONTRACT NUMBER: EP-W-12-031 or 032  
CONTRACT NAME: REPA 5  
CONTRACTOR NAME: Booz Allen & Hamilton or Toeroek Associates, Inc.  
REGION 5 TASK ORDER NUMBER: **5513**

I. **Title** *Corrective Action Support for Solutia, Sauget, IL, BASF Cleveland, Cleveland, OH, and 5 Additional Facilities*

II. **Contract Officer Representatives**

**Contract Level Contract Officer Representative (CLCOR)**

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III. **Authorization**

This Performance Work Statement (PWS) is in accordance with Task 1 (Technical Reviews and Analysis) and Task 2 (Field Oversight, Inspection, Sampling and Data Reviews) of the REPA 5 Zone II Contract PWS.

IV. **Period of Performance**

The period of performance for this Task Order (TO) is from the date of Contracting Officer issuance through September 12, 2014.

V. **Objective/Purpose**

The overall purpose of this TO is to provide corrective action support for 7 priority corrective action projects within Region 5. The support is namely document reviews/document preparation, field oversight, sampling and meeting support. This support may also include conducting investigations, filling data gaps, evaluating 2020 Baseline Sites, or preparing draft Environmental Indicator evaluations and draft Statements of Basis. Documents related to this TO will be delivered to the Contractor in the Chicago office.

VI. **Description of Tasks to be Performed By Contractor**

**Task 01 – Review of Technical Documents, Site Visits and Sampling at Solutia, Sauget, Illinois (ILD 000 802 702)**

**Background:**

An EPA study from 1975 suggested that releases of PCBs to off-site soil via the air pathway may have occurred downwind from the Monsanto WG Krummrich Plant. In early-November 2009, EPA sampled 30 nearby residences and two parks in Sauget, IL and the Rush City community of East St. Louis, IL. A total of 34 five-point composite surface soil samples were obtained and analyzed for PCB homologs and dioxin/furans (total TEQs). In addition, 12 samples found to contain certain PCB homologs were also analyzed for dioxin-like PCB congeners (total TEQs)

The PCB cleanup goal of 1 ppm is exceeded at four sample locations in Sauget and two in East St. Louis. Three sample locations in East St. Louis and 14 of 18 locations in Sauget exceed the recommended interim PRG for dioxin/furans of 72 ppt. Additional characterization and evaluation is necessary to address potential impacts to human health from the presence of PCBs and dioxin/furans in soil exceeding screening standards.

The former Monsanto, now Solutia WG Krummrich Plant has operated for nearly 100 years. The Solutia facility is subject to the requirements of a RCRA 3008(h) Administrative Order on Consent that was issued by EPA on May 3, 2000. Solutia produced PCBs at the WG Krummrich Plant from the 1930's until 1977. From 1971 to 1977, about 151,000 tons of PCBs, chlorinated solvents, plasticizers, polar solvents, and chlorinated aromatics were incinerated on-site. The herbicide Agent Orange was also manufactured at the plant using chlorinated phenols produced on-site as intermediates. Pentachlorophenols were also produced at the plant.

Today, at least 50,000 pounds of residual PCBs are found in contaminated areas on-site. Dioxin-contaminated soil on-site has concentrations as high as 2.81 ppm. On-site soils are also contaminated with dioxin-containing chlorinated phenols. Off-site at the former herbicide production plant (now Ethyl Petroleum), dioxin levels as high as 5.11 ppm total TEQs are found.

Carolyn Bury is the technical contact for the Solutia facility. She can be reached at (312) 886-3020.

### **General Needs:**

Project work will consist of review of Solutia's technical documents. Work would also include visits to the site for oversight and/or sampling and participation in meetings and conference calls

### **Specific Needs:**

**01-01)** Attend an initial meeting/conference call with EPA technical representatives. This meeting/conference call is expected to last 2 hours and will be held in Chicago.

**01-02)** Review of all relevant supporting documents or background information that is readily accessible within the project time frame. Review and provide technical comments of reports related to the corrective action at the facility. This will include the review of at least two technical reports. EPA will make arrangements for the delivery of relevant documents to the contractor.

*The Contractor shall expect to review each document and subsequent revised documents. For the purpose of this task order, the Contractor shall assume one revision per document. The deliverable for each report is to be a letter report/comment letter. Also, in some instances supplemental reports related to the above referenced reports may be submitted to EPA and need contractor review. For the purpose of this task order, the Contractor shall assume 2 supplemental reports of moderate complexity will be submitted for this facility.*

**01-03)** Participation in 4 teleconferences/meetings to discuss project status and/or specific issues related to the project. Teleconferences/meetings are expected to last about 2 hours each and will likely be held in Chicago.

**01-04) )** Participate in 2 site visits related to the design plans review or implementation. These site visits are expected to last no more than 2 days each. One staff is adequate. If Contractor identifies major deviations of plans in the field, they should contact the EPA technical representative. Assistance is also needed to continue the characterization of PCB contamination in soil on private and public parcels in the City of East St. Louis located near the Solutia RCRA Corrective Action Site; the parcels vary in size. Additional analytical data are needed to develop the human health risk evaluation for off-site exposures. A previous soil sampling/analysis event was completed in 2012 based on sample locations selected by EPA. The results of PCB analysis from that

event will be used to guide the selection of the sample locations for the new sampling event. EPA will assist in selecting the locations; EPA has prepared a draft parcel map as a starting point. To accomplish the sampling and analysis, the Contractor will assist EPA as follows:

- 1) Verify target property parcel identification and street addresses (i.e., County Assessor data; property tax PINs; demographic data).
- 2) Support EPA in securing access agreements to the targeted properties by contacting parcel owners (e.g., City of East St. Louis, Solutia, private parties).
- 3) Submit a PCB Sampling and Analysis Plan (SAP) including SOPs for this event. The Contractor may review the existing soil PCB SAP/SOPs and provide revisions as necessary, for EPA approval. The SAP should include the proposed plan for field sampling (e.g., sample depth, soil compositing, soil characterization, chain of custody, etc.).
- 4) Arrange for sample analysis by a qualified laboratory capable of performing PCB analysis in soil samples according to the expected QA/QC standards (e.g., sample handling, holding times, Reporting Limits, non-detect samples, data validation). In consultation with the Contractor, EPA will make a decision on the type of PCB analysis to be performed (e.g., Aroclor analysis; PCB Homolog analysis and/or congeners).
- 5) Prepare a Project Report of the sampling and analysis event for EPA review.

For background information, see EPA's web site at:

<http://www.epa.gov/Region5/cleanup/rcra/solutia/index.html>.

The Contractor will be provided with the following background information in hard copy and/or electronic format: *Date here* "Sampling and Analysis Plan," *Date here* "Sampling Report," and a draft sample location map. The Contractor may need to participate in AdobeConnect teleconferences with EPA to collaborate on sampling locations, the field sampling event, and lab analysis; or if the Contractor is local to the Chicago area, attend a meeting(s) with EPA at its office.

### **Complexity Level:**

The Solutia project is expected to be of moderate complexity. Please refer to the contract PWS for examples of project complexity. On projects of moderate complexity, EPA anticipates the Contractor use predominantly mid or senior level staff to conduct most of the work. Junior staff should be used in a support role, and senior or expert staff in an advisory or review role.

### **Performance Standard:**

The Contractor should refer to Task 1 and 2 of the contract PWS for a description of the performance measures and quality assurance requirements of this TO.

### **Schedule of Deliverables**

**Task 01-01** No deliverables.

**Task 01-02** Within 30 days of receipt of documents, Contractor should provide one written and one electronic copy of the deliverables to the task order representatives. Revised deliverables shall be 15 days.

**Task 01-03** No deliverables.

**Task 01-04** Within 30 days of receipt of this task order, Contractor shall prepare a SAP. After completion of sampling event, contractor shall submit draft Project Report for EPA review within 30 days of receipt of all data.

## **Task 02 – Review of Technical Documents, Site Visits/Sampling at BASF Cleveland, Cleveland, Ohio (OHD 000 804 682)**

### **Background:**

BASF Cleveland is located at 1000 Harvard Avenue, Cleveland, Ohio. BASF changed consultants since the original work plan was prepared. The work plan therefore contains new field SOPs and potentially new analytical SOPs which have not been reviewed previously. Note that the Site is also under the jurisdiction of the Army Corps Formerly Utilized Sites Remediation Action Program and has radiological contamination from when the former chemical company worked under contract to the Manhattan Project. While the CA work is for hazardous waste, specific aspects of the work plan require some knowledge of radiological contamination evaluation in order to assess the proposed approach to radiological field screening and handling of samples, and the laboratory's approach to analyzing samples for hazardous waste that screened positive for radiation (this is a minor but important part of the review). In addition, knowledge of the proposed XRF field-screening techniques and their limitations is needed as there is metals contamination in the soil in excess of 10,000 ppm, including nickel. RFI field work is anticipated to begin in late 2014.

Carolyn Bury is the technical contact for the BASF facility. She can be reached at (312) 886-3020.

### **General Needs:**

Project work will consist of review of BASF's technical documents. Work would also include visits to the site for oversight and/or sampling and participation in meetings and conference calls

### **Specific Needs:**

**02-01)** Attend an initial meeting/conference call with EPA technical representatives. This meeting/conference call is expected to last 2 hours and will be held in Chicago.

**02-02)** Review of all relevant supporting documents or background information that is readily accessible within the project time frame. Review and provide technical comments of reports related to the corrective action investigation at the facility. This will include the review of the BASF Cleveland May 9, 2014 RCRA Facility Investigation Work Plan Revision 1 (work plan) in its entirety. The work plan includes the QAPP,

HASP, SOPs, etc. The work plan was originally submitted in February 2011 (“original work plan”) and was revised per EPA’s January 2014 and June 2013 comments. The contractor will review the work plan for consistency with EPA’s original work plan review comments. In addition, the work plan should be reviewed for any changes to the original work plan which were made independent of the review comments. EPA will make arrangements for the delivery of relevant documents to the contractor.

EPA will provide the work plan in electronic and hard-copy formats. EPA has noted that an appendix (Radiation Protection Plan) is missing from the Health and Safety Plan; EPA will provide the contractor with the appendix when it is received. EPA will also provide the original work plan, copies of comment/response letters, the Current Conditions Report, and the Unilateral Administrative Order. The work plan includes a table showing where in the document(s) the EPA comments have been addressed.

*The Contractor shall expect to review each document and subsequent revised documents. For the purpose of this task order, the Contractor shall assume one revision per document. The deliverable for each report is to be a letter report/comment letter. Also, in some instances supplemental reports related to the above referenced reports may be submitted to EPA and need contractor review. For the purpose of this task order, the Contractor shall assume 2 supplemental reports of moderate complexity will be submitted for this facility.*

**02-03)** Participation in 4 teleconferences/meetings to discuss project status and/or specific issues related to the project. Teleconferences/meetings are expected to last about 2 hours each and will likely be held in Chicago.

**02-04)** Participate in 2 site visits related to the design plans review or implementation. These site visits are expected to last no more than 2 days each. One staff is adequate. If Contractor identifies major deviations of plans in the field, they should contact the EPA technical representative. RFI field work is anticipated to begin in late 2014. Contractor support will be requested for limited field oversight and possible split sample collection. Although not planned at this time, contractor shall be prepared to accept split samples from the facility and ship these samples to the Region 5 Central Regional Lab. Split sample collection, if necessary shall coincide with any site visits.

### **Complexity Level:**

The BASF Cleveland project is expected to be of moderate complexity. Please refer to the contract PWS for examples of project complexity. On projects of moderate complexity, EPA anticipates the Contractor use predominantly mid or senior level staff to conduct most of the work. Junior staff should be used in a support role, and senior or expert staff in an advisory or review role.

### **Performance Standard:**

The Contractor should refer to Task 1 and 2 of the contract PWS for a description of the performance measures and quality assurance requirements of this TO.

## **Schedule of Deliverables**

**Task 02-01** No deliverables.

**Task 02-02** Within 30 days of receipt of documents, Contractor should provide one written and one electronic copy of the deliverables to the task order representatives. Deliverables for revised document reviews shall be 15 days.

**Task 02-03** No deliverables.

**Task 02-04** Within 15 days of each site visit, Contractor should provide a short letter report documenting the results of the site visit.

## **Task 03 – Task 07 Review of Technical Documents and Other Site Characterization Activities for 5 Additional Region 5 Facilities**

### **Background:**

For the purposes of this task order, the Contractor shall assume support will be needed at 5 additional Region 5 sites. It should be assumed that two sites will be located in or around Detroit, Michigan two sites will be located in or around Cleveland, Ohio, and the last site will be located in or around Springfield, Illinois. The specific requirements for each of these facilities will be issued by technical direction memoranda (TDM). The technical contacts will also be identified in the TDM.

### **General Needs:**

The support necessary will involve the review/preparation of documents, and/or the gathering of samples and oversight visits. These are tasks consistent with Tasks 1 and 2 of the contract PWS.

### **Specific Needs:**

**03 thru 07-01)** Contractor shall attend an initial meeting/conference call with EPA technical representatives. This meeting/conference call is expected to last 2 hours and will be held in Chicago.

**03 thru 07-02)** If not already familiar with the particular facility, the Contractor shall plan on reviewing some relevant background information. These documents will be provided to the Contractor or made available in the Region 5 file room. Contractor shall provide a detailed technical review of two documents of moderate complexity for each of the five additional facilities. Consistent with this task order, EPA may request the preparation of documents related to conducting investigations, filling data gaps, evaluating 2020 Baseline Sites, or preparing draft Environmental Indicator evaluations and draft Statements of Basis.

*The Contractor shall expect to review each document and subsequent revised documents. For the purpose of this task order, the Contractor shall assume one revision per document. The deliverable for each report is to be a letter report/comment*

*letter. Also, in some instances supplemental reports related to the above referenced reports may be submitted to EPA and need contractor review. For the purpose of this task order, the Contractor shall assume 2 supplemental reports will be submitted for each facility.*

**03 thru 07-03)** Participation in up to four (4) meetings/conference calls will be needed for each facility to discuss the findings. These meetings/conference calls are expected to last about a half day and will be held in Chicago. Meetings will be scheduled by EPA.

**03 thru 7-05)** Contractor shall conduct field oversight at each of the five additional facilities. Field oversight should require overnight travel for 6 days in two trips at each facility. One staff is adequate. If Contractor identifies major deviations of plans in the field, they should contact the EPA technical representative. Although not planned at this time, contractor shall be prepared to accept split samples from the facility and ship these samples to the Region 5 Central Regional Lab. Split sample collection, if necessary shall coincide with any site visits.

### **Complexity Level:**

These facilities are expected to be of moderate complexity. Please refer to the contract PWS for examples of project complexity. On projects of moderate complexity, EPA anticipates the Contractor use predominantly mid or senior level staff to conduct most of the work. Junior staff should be used in a support role, and senior or expert staff in an advisory or review role.

### **Performance Standard:**

The Contractor should refer to Task 1 and 2 of the contract PWS for a description of the performance measures and quality assurance requirements of this TO.

### **Schedule of Deliverables**

**Task 03 thru 07-01** No deliverables.

**Task 03 thru 07-02** Within 30 days of receipt of documents, Contractor should provide one written and one electronic copy of the deliverables to the task order representatives for each document. Deliverables for revised document reviews shall be 15 days.

**Task 03 thru 07-04** No deliverables.

**Task 03 thru 07-05** Within 15 days of each oversight, contractor shall provide EPA with a short letter report with photos, documenting the results of the oversight visit.



VII. **Technical Direction**

Technical Direction is for the purpose of clarification of the PWS only. If a Technical Direction Document is issued which changes the scope or increases/decreases the price of the task order, the Contractor shall not proceed. The Contractor shall immediately contact the CLCOR, Contracting Officer and Contract Specialist.